

# **RESPONSE**

# **EXHIBIT 1**

12/17/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.  
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Mark Zuckerberg

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1 BY ATTORNEY BOIES:

2 Q. And when you say "more broadly or later,"  
3 you're talking up to the present time; is that  
4 correct?

5 A. Yeah. After Llama 1 to the present.

6 Q. Let me ask you to look at the bottom of  
7 this first page.

8 And this is for context. Do you see the  
9 reference to LibGen there?

10 A. Yes.

11 Q. I know that you say that you had not heard  
12 of LibGen prior to your deposition preparation in  
13 any event.

14 But I want -- well, I want you to look at  
15 the next page, at the top, where Eleonora Presani  
16 writes:

17 [As Read] I don't think we should use  
18 pirated material.

19 Do you see that?

20 A. Yes.

21 Q. Even if you'd never heard of LibGen, were  
22 you aware of concern being expressed by people at

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1 Meta about using pirated material to train Meta's AI  
2 models?

3 ATTORNEY GHAJAR: Objection. Vague.

4 THE WITNESS: No, I don't think I was  
5 aware of this.

6 BY ATTORNEY BOIES:

7 Q. I want to ask not merely whether you are  
8 aware of this particular statement by Eleonora  
9 Presani. I want to be asking whether you are aware,  
10 generally, of any discussions within Meta expressing  
11 concern about Meta's use of pirated material to  
12 train its AI models?

13 ATTORNEY GHAJAR: Objection. Vague.

14 And lacks foundation.

15 THE WITNESS: Can you repeat it.

16 BY ATTORNEY BOIES:

17 Q. Are you aware of any discussions within  
18 Meta in which Meta employees expressed concern about  
19 Meta's use of pirated material to train its AI  
20 models?

21 ATTORNEY GHAJAR: Objection.

22 THE WITNESS: I'm not --